

1 companies, two way radios, in their trucks, vehicles, et
2 cetera. We repaired radios, we installed radios, we sold
3 radios, and we had repeater systems.

4 Q Do you have any knowledge about what percentage of
5 the revenues of DLB were derived from each of those various
6 functions?

7 A Specifically of how much or percentage wise, I
8 would say that the repeater systems were a backbone of it.
9 I would think the repeater systems would have taken up a
10 good healthy portion of the entire receivables. Of course
11 sales would take up some of it. I would have to say maybe
12 it was thirds. A third repeater, a third sales, and a third
13 service is the best determination that I could make myself.

14 Q Did you have anything to do with the sales or
15 service end of the business?

16 A I of course, when a customer came in the front
17 door for service I took an order out to the service
18 personnel to perform that service. When the service was
19 completed I did an invoice to bill the customer for that
20 service. I would probably be the one who would go out there
21 and tell a specific technician that I wanted you to do this
22 removal or, if there wasn't the service manager available
23 then I would probably be the one to tell a specific service
24 person to go out and do that particular task.

25 Q Were the sales and/or the service functions of the

1 business related in any way to the repeater portion of the
2 business? Do you understand my question?

3 A No. I think you better ask that again. I
4 don't --

5 Q Did, for example, the customers of the repeater
6 business regularly use, regularly buy equipment from DLB?

7 A Oh, okay.

8 Sales staff would sell radios to a customer that
9 they would load onto the repeater system. So yes, there was
10 connections between all of the departments. The sales
11 person would sell a radio, the service department would
12 install it in somebody's vehicle or base station, and they
13 would be added to the repeater systems that were run. So
14 they were all interrelated.

15 Of course it was possible to have a radio that you
16 already owned and put it on the system too. We didn't
17 always have to sell it to them. They may have purchased it
18 from someone else. But they could still come to us and get
19 it loaded on a system.

20 Q How were the fees, the repeater fees set? Do you
21 know?

22 A Ron Brasher set the fees for the service or for
23 the repeater service that we provided.

24 Q Do you know how they were set?

25 A I basically don't really know how they were set

1 other than it was a competitive market and he tried to make
2 it competitive.

3 Q Do you know what the, do you know the range, the
4 areas that DLB covered with their repeater service?

5 A Our systems covered three basic areas. They
6 covered Dallas, Fort Worth, and Allen, Texas.

7 Q Would you have seen any documentation as to, so
8 that you could determine where each customer was assigned?

9 A Usually when they were set up on the repeater
10 systems, the sales people would come to me and say we're
11 loading them onto the Dallas, Fort Worth and Allen system.
12 Usually all customers were loaded on all systems. It was a
13 selling point to be able to provide service that would cover
14 the entire area. And to cover the entire area you basically
15 had to be on all three systems.

16 Q When you say it was a selling point, that was
17 desirable to the customers?

18 A Yes. It was desirable to the customers to be able
19 to talk all over the area.

20 Q If, for example, you had not had the Allen site,
21 would that have affected the number of customers that DLB
22 had on their repeater system?

23 A Well yeah, I would think so because you couldn't
24 cover the north end of the area well without having an Allen
25 system.

1 Q Do you know anything about a big customer that DLB
2 was trying to woo back in 1995, 1996? The --

3 MR. ROMNEY: Your Honor -- I'm sorry. I thought
4 Ms. Lancaster was finished with her sentence.

5 MS. LANCASTER: Go ahead.

6 MR. ROMNEY: I request that the witness be
7 instructed not to give the name of the customer. That's
8 trade secret information of my client.

9 THE COURT: Do you understand, if you do know the
10 answer to the question don't say the name of the company.
11 Just say a big company or whatever.

12 THE WITNESS: Okay.

13 THE COURT: And of course if you don't know, then
14 you don't know.

15 THE WITNESS: I think I know what she's referring
16 to, but I think you better ask it again.

17 MS. LANCASTER: Okay.

18 BY MS. LANCASTER:

19 Q Are you familiar with the fact that DLB was trying
20 to woo a large customer back in 1995 and 1996? And I
21 believe testimony has been presented that it was a concrete
22 or gravel company.

23 A Okay. We had a large customer at that time on our
24 900 MHz system. They were wanting to purchase a new system,
25 an upgrade. We were hoping to load that large customer from

1 our 900 system onto our newest T-band system.

2 Q And as a result of this customer were you aware
3 that DLB was attempting to acquire frequencies in the Allen
4 area?

5 A They were trying to get frequencies to cover the
6 entire area. I don't necessarily know that it was just
7 Allen, it was all of them.

8 Q Okay. Had that gone on in other periods of time
9 that you worked there, where there was a push to obtain
10 frequencies?

11 A Yes, I believe that back in the early '90s he, Mr.
12 Ron Brasher was attempting to get 900 MHz frequencies back
13 in the early '90s.

14 Q And in 1995 was he trying to get any particular
15 type of frequencies?

16 A In 1995 he was trying to get T-band frequencies.
17 Mr. Brasher, Ron Brasher was trying to get T-band
18 frequencies.

19 Q Do you know what frequencies are considered T-band
20 frequencies?

21 A I think they range in the 480 MHz range, that
22 area. 483, 485, something point so and so. Something like
23 that.

24 Q I believe you stated earlier that fees were
25 competitive. In 1995, 1996 how competitive was the repeater

1 service in the Dallas/Fort Worth area?

2 MR. ROMNEY: Objection. Lacks foundation.

3 THE COURT: Sustained.

4 BY MS. LANCASTER:

5 Q You worked at DLB in 1995.

6 A Yes, I did.

7 Q What was the basis of you stating earlier that,
8 when you testified that Ron set the fees and that it was
9 competitive, it was a competitive industry. What was the
10 basis of you making that statement?

11 A Ron Brasher set the fees so that they would not be
12 more than another company's fees, nor less than another
13 company's fees, so that they would be basically equal. You
14 were providing an equal service and you were going to charge
15 them an equal or lesser amount of money to get that customer
16 to join your system rather than someone else's. He tried to
17 keep it so that the fees were acceptable to a customer, but
18 we would still, Metroplex Two Way Radio could still make
19 money from it.

20 Q Were there a lot of other competitors?

21 A I believe there were several, yes. I don't know
22 for sure how many but there were more, yes, certainly.

23 Q Was there ever discussions at DLB wherein DLB was
24 worried about competitors trying to take business away from
25 DLB?

1 A You always worried about competitors taking
2 business away from Metroplex Two Way.

3 Q And you overheard discussions about that?

4 A Certainly, yes.

5 Q Did you participate in discussions about that?

6 A I may have. I don't specifically remember, but I
7 probably might have been asked questions about did anybody
8 call and ask about this or that and the other.

9 Q Have you been an FCC licensee?

10 A Yes, I am.

11 Q How many licenses have you had in your name?

12 A I've had two.

13 Q When did you obtain the first license?

14 A I believe I obtained a 900 MHz license in early
15 '90s, like '91 or '92. I'm not sure exactly when.

16 Q Can you tell the Judge the circumstances upon
17 which you got that license?

18 A Ron Brasher was in need of adding licenses or
19 adding repeaters to his system. You have to have a license
20 to run a repeater. He needed additional licenses that he
21 could not obtain himself and asked me would I get one for
22 him.

23 Q At that time you were employed by DLB/Metroplex,
24 is that correct?

25 A Yes, that is correct.

1 Q So he came to you and asked you if you would apply
2 for a license on his behalf.

3 A Yes, he did.

4 Q And you agreed to do that.

5 A Yes, I did.

6 Q Do you know what your call sign, your station call
7 sign was for that license?

8 A For the 900 MHz license, no, I do not.

9 Q Did you participate in any way in managing that
10 license?

11 A No, I did not.

12 Q Did you have anything to do with that license at
13 all?

14 A Other than to be the name on the license paper, as
15 far -- No. I did not.

16 Q Were you ever offered any type of payment for, in
17 return for applying for the license?

18 A Ron Brasher said that he would put a telephone in
19 my car -- a two way radio with a telephone interconnect
20 capability in my car, and if I wanted it, he could put one
21 in my husband's, in my children's car as well.

22 Q Do you recall if you got a radio/telephone at that
23 time?

24 A Yes, I did have a phone in my car at that time,
25 but just, only I had one.

1 Q Did you get the car phone in response to Ron's
2 offer of the phone as payment for getting the license?

3 A I didn't really think of it that way because it
4 was put in my car more or less so that the office personnel
5 and the service personnel, if they needed me when I was out
6 doing errands they could get in touch with me. Ron is not
7 really the one who actually authorized the phone to be put
8 in my car.

9 Q Who authorized the phone be put in your car?

10 A The first phone that was put in my car was at the
11 authorization of Randy Safford, the sales manager.

12 Q Why did he offer to put a phone in your car?

13 A Because Ronald never came to me and said hey, Sue,
14 let's bring your car in and put a phone in it.

15 Q Why would Randy Safford have anything to do with
16 whether or not you had a phone put in your car?

17 A Well, he had access to the stock, the radio stock
18 equipment, so he pulled one out and said go put it in. Now
19 this was back in 1990s, you understand. Not recently.

20 Q Did there come a time when you got another phone?

21 A Yes, I did.

22 Q When was that?

23 A In 1996 when I came back to work for Metroplex Two
24 Way the second time, I got another phone put in my car.

25 Q Why did you get a phone put in your car at that

1 time?

2 A Pat Brasher actually authorized me to get the
3 phone put in my car at that time. I had been out doing
4 errands, if I could explain more about that.

5 Q Certainly.

6 A I had been out doing errands and something had
7 happened and Pat had wanted to get in touch with me and she
8 couldn't get in touch with me because I didn't have a phone
9 in my car. When I came back to the office she wanted to
10 know why I didn't have one. I said well Ronald just never
11 got around to putting one in my car, I guess. She says you
12 need a phone in your car. Go to the stock room, pull it
13 out, get one of those installers to put it in your car.

14 Q Did the second phone that you got put in your car
15 have anything to do with payment for becoming a licensee?

16 A Well when Ronald --

17 THE COURT: Let's establish the timeframe. There
18 is a second license.

19 MS. LANCASTER: Yes, sir. I'll go back and cover
20 that.

21 THE COURT: Yeah, and let's get the proper
22 sequence.

23 MS. LANCASTER: Okay.

24 I'm going to backtrack just a little bit and not
25 ask you about the phone. Let's finish up first with the

1 first license that you got.

2 BY MS. LANCASTER:

3 Q I believe you stated that you got a 900 MHz
4 license at Ronald's request back sometime between '91 and
5 '92, is that right?

6 A Yes, that's correct.

7 Q Do you know what happened to that license?

8 A No, I really don't know what happened to the
9 license. When I came back to work for them the second time
10 I no longer had a 900 MHz license.

11 Q How do you know --

12 A I assume I didn't have one because I never got any
13 more correspondence from the FCC in regards to a 900
14 license.

15 Q After you filed the license application did you
16 sign any other papers regarding that first license?

17 A I may have. I don't particularly remember, but I
18 may have.

19 Q But aside from signing the application and/or any
20 other papers that you may have gotten, did you have anything
21 to do whatsoever with that license?

22 A No. I did not.

23 Q Did there come a time when you obtained another
24 license?

25 A Yes, I did.

1 Q Can you explain to the Judge the circumstances
2 surrounding the submission of an application for your second
3 license?

4 A After I returned to Metroplex Two Way in 1996, Ron
5 Brasher asked me again, stating the same reasons from
6 before. He needed additional licenses, would I help him out
7 and apply for one, and in return for that, he would give me
8 a phone in my car.

9 Q I believe you testified just a moment ago that Pat
10 had authorized the phone in your car during that timeframe,
11 is that correct?

12 A Later on Pat had been the one to authorized that I
13 actually get the phone put in my car, and I believe that was
14 sometime in 1997 that I actually got the phone put in my
15 car.

16 Q So in 1996, Ron approached you and asked you to
17 sign another license application.

18 A That is correct.

19 Q And you agreed to do that.

20 A Yes, I did.

21 Q and you signed the application.

22 A Yes, I did.

23 Q As far as you know, the license was put in your
24 name.

25 A That is correct, yes.

1 Q I would like for you to turn in the booklets in
2 front of you to Exhibit 57.

3 THE COURT: It's in the other book.

4 MS. LANCASTER: It's a tab. It says 57 on it.

5 (Pause)

6 BY MS. LANCASTER:

7 Q Beginning on page two through page seven of
8 Exhibit 57, will you examine that and tell me if you
9 recognize it, that document?

10 A The two down here at the bottom?

11 Q Yeah, there's a little two and a circle on the
12 bottom of the page.

13 A It says it's an application for a mobile radio
14 service. So yeah, I guess I recognize this as an
15 application for a license.

16 Q Look on page three, the little circle with the
17 three on the next page. Do you recognize the signature in
18 Box 42 of that form?

19 A Yes, that is my signature.

20 Q And Box 43 has a date. Did you also put the date?

21 A Yes, I did.

22 Q Is this the application that you signed in
23 response to Ron's request in 1996?

24 A Yes, it is. It appears to be.

25 Q Did you fill out all of the information that's

1 contained in this application?

2 A I don't specifically remember filling out this
3 information. No, I don't.

4 Q Do you remember whether or not it was already
5 filled out when it was handed to you?

6 A I can't honestly say that I remember one way or
7 the other.

8 Q Look on page five of the application.

9 A Okay.

10 Q Would you have known what information to put into
11 the boxes on page five of the application?

12 A No. I wouldn't have.

13 And can I clear something up here?

14 Q Certainly.

15 A To me, are you saying that all of these pages is
16 the whole application?

17 Q Is this not what you thought was the application?

18 A No. I mean the application things that I remember
19 filling out are like one page long.

20 Q Do you recognize --

21 A I don't recognize any of these other pages other
22 than to say that the signature page, that's my signature,
23 and I probably signed that page, but --

24 THE COURT: Let's do it a page at a time and see
25 what --

1 THE WITNESS: I don't know what all these pages
2 are. I've never seen these other pages.

3 BY MS. LANCASTER:

4 Q Okay. Let's go back to page two.

5 Do you recognize that page?

6 A Not specifically, no. I mean it's got my name on
7 it, it's got my old address on it. But as far as
8 recognizing it, I don't particularly recognize it.

9 THE COURT: That address, that's where you
10 lived --

11 THE WITNESS: That's where I used to live, yes.
12 And that's where I lived at that time, yes. But I don't
13 really recognize this as being an application because, like
14 I said, an application to me was one page that I signed.

15 MS. LANCASTER: Okay.

16 BY MS. LANCASTER:

17 Q Page three, the little circle three.

18 A Okay.

19 Q Is that the page that you signed?

20 A That's my signature. And if it's affixed to this
21 page I'm assuming I signed it.

22 Q Do you recall signing it?

23 A I remember signing an application but I don't
24 particularly remember what it looked like other than it was
25 one page.

1 Q Page four. Do you recognize this page?

2 A No, I do not.

3 Q Page five.

4 A I don't recognize that page either. This is not
5 information I'm even familiar with.

6 Q Page six? Do you recognize that page?

7 A No, I don't recognize that page either.

8 Q Page seven?

9 A No, I do not.

10 Q When Mr. Brasher asked you to sign an application
11 in 1996 --

12 THE COURT: Ron?

13 BY MS. LANCASTER:

14 Q Yes, I'm sorry. when Ronald Brasher asked you to
15 sign an application in 1996, did he give you any information
16 as to what your responsibilities would be as a licensee?

17 A He didn't explain that I had any responsibilities
18 at all.

19 Q What did he tell you specifically?

20 A He said he needed additional licenses, this was a
21 way for him to obtain the use of licenses, and that, asked
22 me would I let him get a license in my name. But as far as
23 explaining anything to me in regards to what my
24 responsibilities were or liabilities were, that was not
25 discussed.

1 Q Would you turn to Exhibit 19, which is the other
2 book. That whole big book is one exhibit. In the very
3 beginning there is a cover letter. And would you look at
4 the page that has, it's a Bates stamp 0000005. It's
5 actually the sixth page of the exhibit. The numbers are
6 incorrectly done.

7 A The what now?

8 Q It says page five.

9 THE COURT: Let's get to the right page. I'll
10 help.

11 THE WITNESS: Thank you.

12 THE COURT: Okay, Ms. Lutz has got page five in
13 front of her.

14 THE WITNESS: I've got page five.

15 BY MS. LANCASTER:

16 Q Would you look at the top of that page. You see
17 where it says Carolyn S. Lutz?

18 A Yes, I do.

19 Q It states, "Mr. Brasher approached Ms. Lutz and
20 provided to her an opportunity to become a Commission
21 licensee for operation of 470 through 512 MHz band radio
22 facility. As an employee of DLB" --

23 THE COURT: Why don't you let Ms. Lutz read it to
24 herself, if that's what you want her to do.

25 Is that what you want her to do?

1 MS. LANCASTER: Yes, sir. If I read it, it's in
2 the record. That's the only thing.

3 THE COURT: It's in the record now.

4 Go ahead. Tell me when you're finished. Take
5 your time.

6 If there's anything before or after, you can read
7 it.

8 (Pause)

9 THE WITNESS: I cannot specifically state that I
10 ever saw this particular statement, no.

11 BY MS. LANCASTER:

12 Q I want to go through the statement just a little
13 bit.

14 It states here that your actions in signing the
15 license application were voluntary and that your employment
16 was not conditioned upon that. Is that a true statement?

17 A As far as I knew, yes.

18 Q You didn't have to sign the license if you didn't
19 want to.

20 A No, I didn't.

21 Q Next it says that you would be entitled to all
22 benefits of operation as a licensee including profits,
23 opportunities, gain from future sale that would arise out of
24 the operation of the facilities.

25 Did you have any discussions whatsoever with

1 Ronald Brasher regarding sharing in profits of any station
2 that was granted as a result of your application?

3 A Absolutely not. The monies or profits to me or
4 benefits to me were never discussed in the form of money to
5 me or profits to me, no. The only benefit I was supposed to
6 get from holding the license was the ability to have a radio
7 phone in my car.

8 Q Okay.

9 Look at page 10 of Exhibit 19.

10 A Okay.

11 Q Before I ask you about page ten, did you have any
12 expectation to make money off of this license?

13 A Absolutely not. I had no -- It wasn't my station
14 that was running. I had no reason to expect money from it.
15 It wasn't mine.

16 Q Who's was it?

17 A It was Ron Brasher's.

18 Q Look at page ten, number 11. You see there's a
19 section that's numbered 11?

20 A Yes.

21 Q In the second paragraph of number 11, would you
22 just read that second paragraph?

23 A Should I read it to myself?

24 Q Yes.

25 THE COURT: I don't think you laid a foundation

1 for this because this concerns assigning licenses to DLB,
2 and you haven't established that that --

3 MS. LANCASTER: Okay, we'll go back.

4 THE COURT: In terms of the chronology.

5 MS. LANCASTER: Okay.

6 THE COURT: So you don't have to read it, if you
7 don't want to.

8 MS. LANCASTER: Don't read it yet then.

9 THE WITNESS: Okay.

10 BY MS. LANCASTER:

11 Q At some point you were issued a license.

12 A Yes, that's right.

13 Q Do you know the call sign for your license?

14 A WP something 763, I believe is what the license
15 said.

16 Q Would you turn to Exhibit 58 which is in the other
17 book? You're going to have to go back and forth a little
18 bit.

19 A Okay.

20 (Pause)

21 A I have it.

22 MS. LANCASTER: Your Honor, for the record I'd
23 like to note that Exhibit 58 is the same document as is also
24 shown in Exhibit 19, page 242.

25

1 BY MS. LANCASTER:

2 Q do you recognize that license?

3 A Yes, it's the license that was issued in my name.

4 Q Did you receive it in the mail?

5 A Yes, I did.

6 Q What did you do with it when you got it?

7 A I carried it to the office and gave it to Ron
8 Brasher as he instructed me to do.

9 Q Did you give him a copy or the original?

10 A I gave him the original, but I kept a copy.

11 Q Turn to Exhibit 60.

12 A I have it.

13 Q Do you recognize that document?

14 A I recognize it as a document that I identified
15 during the deposition as pages that I received and signed,
16 yes.

17 Q Okay.

18 A But I don't really know what it is.

19 Q Did you read it?

20 A Not particularly, no.

21 Q Did you fill in all of the information that's
22 filled in on the blanks in the document?

23 A I don't remember filling it in, but I could have
24 done it. I typed a lot of things. I may have typed this.
25 I just don't really remember specifically doing it.

1 Q If you had filled it in, would you have done it of
2 your own knowledge? Would you have been able to, for
3 example, go to number four. You see some paragraphs near
4 the bottom and they're listed one, two, three, four?

5 A Yes, I see them.

6 Q Would you have been able to fill in the frequency
7 from your own knowledge?

8 A No, I would not.

9 Q Do you -- Who would have supplied that information
10 for you?

11 A Ron Brasher would have supplied it.

12 Q Do you recall discussing this form with Ron
13 Brasher?

14 A I don't particularly think a lot of discussion
15 went on. I brought it in when it was mailed to me, I gave
16 it to him.

17 Q Did you sign it before or after you brought it in?

18 A I probably signed it and gave it to him.

19 Q Did you sign it before or after all the blanks
20 were filled in?

21 A I don't remember. It could have been either way.

22 Q Turn to Exhibit 61. Do you remember this
23 document?

24 A Is this where you sign it over to somebody else?

25 Q Read the top of it.

1 A It says "Assignment of Authorization, to be used
2 in the private radio service indicated below where the
3 present licensee's activities are intended to be continued
4 under new --". Yes, this is a form that assigns my license,
5 or transfers my license to somebody else.

6 Q Do you recognize the signature at the bottom of
7 the block?

8 A Yes, that's my signature.

9 Q Do you recall signing this document?

10 A Yes, I do.

11 Q What were the circumstances under which you signed
12 it?

13 A After the Net Wave investigation happened and the
14 back and forth thing with that, I asked that the license be
15 taken out of my name, and Ronald gave me this form to fill
16 out and sign it so that he could transfer the license to
17 Metroplex Two Way Radio.

18 Q You say he gave it to you to fill out. Did you
19 fill in the typing or under the radio service block, and the
20 call sign block, and the licensee name and station block,
21 did you fill in all of the blanks on the form?

22 A I may have typed those in. I probably did, but
23 specifically I don't remember.

24 Q If you did type those in, did you type them in
25 because you had that knowledge or were you directed as to

1 what to put in there?

2 A If I typed this information in, someone gave it to
3 me. The normal circumstance for typing documents in of this
4 nature would be Ronald would take a copy of it, write in
5 handwriting what he wanted on the specific line. I would
6 take the original to the typewriter, put it in, and type
7 from his handwritten page.

8 Q Do you recall that happening in this instance?

9 A Not specifically. This really doesn't look like
10 one that I typed, and the reason that I say that is because
11 the certain way that this was done in here doesn't look like
12 the way that I would do it.

13 Q What do you mean?

14 THE COURT: When you say done in here, you were
15 pointing to such assignment to DLB Enterprises, Inc.?

16 THE WITNESS: Yes.

17 THE COURT: That's the line you were pointing to?

18 THE WITNESS: Yes, that's the one that I'm
19 pointing to. The one in the middle where it says
20 certification and on the typewritten line it says DLB
21 Enterprises, Inc., d/b/a Metroplex Two Way Radio.

22 If I were going to type that in, that would not be
23 the way that I would type it.

24 THE COURT: How would you type it?

25 THE WITNESS: I would type in DLB Enterprises dba

1 with no slashes or spaces between those marks. That's not
2 the way I would type that symbol d/b/a, doing business as.

3 THE COURT: What if somebody gave you a filled in
4 form, a handwritten form?

5 THE WITNESS: Even if Ronald had given it to me,
6 he wouldn't have put that in and I wouldn't have typed it in
7 like that. That's not the way I type that phrase, and I
8 typed that phrase many times for Metroplex Two Way Radio
9 because they were DLB's Inc., doing business as Metroplex
10 Two Way. But I never put slashes between those D, B and A.

11 BY MS. LANCASTER:

12 Q So do you think this form was presented to you
13 already completed?

14 A I believe that it may have been.

15 Also, the typewriter that I typed on at Metroplex
16 Two Way Radio has very large type. I specifically bought a
17 certain kind of print wheel that typed big.

18 THE COURT: You're talking about a plastic print
19 wheel?

20 THE WITNESS: Yeah, a plastic print wheel that you
21 slide into the typewriter. Mine was big. Huge, as a matter
22 of fact, and this is kind of small. This doesn't look like
23 from my typewriter.

24 BY MS. LANCASTER:

25 Q For those reasons, you don't believe that you

1 completed this form.

2 A For that reason I don't believe that I actually
3 typed this form.

4 Q But you --

5 A I did sign it, but I don't believe that I typed
6 it.

7 Q And did you place the date next to your signature?

8 A It appears to be, yes.

9 Q Let's go back to page 10 of Exhibit 19.

10 A Okay.

11 Q I believe you just testified that you asked Ronald
12 to get the license out of your name after you had been
13 served, or after the Net Wave petition had been filed, is
14 that correct?

15 A Yes.

16 Q I would like for you to read the second paragraph
17 under the 11. You see where there's a section and it's
18 numbered 11?

19 A Yes, I do.

20 Q Well, you can read the first and second paragraph
21 actually.

22 (Pause)

23 A Is this basically stating, is what I'm getting out
24 of it that they're allowing me to use a radio, that I'm not
25 to receive money, and that there's agreements, et cetera and